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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIO ANTHONY NOBLE,  
DREW WILSON CRANDALL,  
SEAN MICHAEL GYGI,  
KATHERINE LAUREN ANNE BUSTIN and  
ALEXANDRYA MARIE TONGE,

Defendants.

Case No. 2:16CR00631-DAK-PMW

MOTION FOR ORDER  
OF FORFEITURE

Judge Dale A. Kimball

Magistrate Judge Paul M. Warner

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Pursuant to Fed R. Crim. P. Rule 32.2(b), the United States of America respectfully submits this Motion for Order of Forfeiture. In support of this motion, the government states:

1. On May 31, 2017, a federal grand jury sitting in the District of Utah, returned an Indictment charging Mario Anthony Noble, Drew Wilson Crandall, Sean Michael Gygi, Katherine Lauren Anne Bustin and Alexandrya Marie Tonge with Continuing Criminal Enterprise, in violation of 21 U.S.C. § 848, (Count 1), Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. § 846, (Count 2-3), Aiding and Abetting the Importation of a Controlled Substance, in violation of 21 U.S.C. § 952, (Count 4-6), Possession of Fentanyl with Intent to Distribute, in violation of 21 U.S.C. § 841(a)(1), (Count 7-8), Manufacture of Alprazolam, in violation of 21 U.S.C. § 841(a)(1), (Count 9), Knowing and Intentional

Adulteration of Drugs While Held for Sale, in violation of 21 U.S.C. §§ 331(k) & 333(b)(7), (Count 10-11), Use of the U.S. Mail in Furtherance of a Drug Trafficking Offense, in violation of 21 U.S.C. § 843(b), (Count 12), Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h), (Count 13), Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, in violation of 18 U.S.C. § 1957(a), (Count 15) and Money Laundering Concealment, in violation of 18 U.S.C. § 1956(a)(1)(A)(i), (Count 14).

2. The Court's jurisdiction in this matter is founded in 28 U.S.C. §1355. The United States sought forfeiture pursuant to 21 U.S.C. § 853 and 18 U.S.C. § 982(a)(1).

3. On May 14, 2018, the defendant, Mario Anthony Noble, pleaded guilty to Conspiracy to Distribute Fentanyl and Conspiracy to Distribute Alprazolam (Counts 2 and 3 of the Superseding Indictment).

4. On October 17, 2018, the defendant, Drew Wilson Crandall, pleaded guilty to Conspiracy to Distribute Fentanyl, Conspiracy to Distribute Alprazolam and Conspiracy to Commit Money Laundering (Counts 2, 3 and 13 of the Superseding Indictment).

5. On June 7, 2018, the defendant, Sean Michael Gygi, pleaded guilty to Conspiracy to Distribute Fentanyl, Conspiracy to Distribute Alprazolam, Aiding and Abetting the Importation of a Controlled Substance and Use of the U.S. Mail in Furtherance of a Drug Trafficking Offense (Counts 2, 3, 6, and 12 of the Superseding Indictment).

6. On June 7, 2018, the defendant, Katherine Lauren Anne Bustin, pleaded guilty to Conspiracy to Distribute Fentanyl, Conspiracy to Distribute Alprazolam, Possession of Fentanyl with Intent to Distribute, Use of the U.S. Mail in Furtherance of a Drug Trafficking Offense and Conspiracy to Commit Money Laundering (Counts 2, 3, 8, 12 and 13 of the Superseding Indictment).

7. On June 7, 2018, the defendant, Alexandrya Marie Tonge, pleaded guilty to Conspiracy to Distribute Fentanyl, Conspiracy to Distribute Alprazolam, Possession of Fentanyl with Intent to Distribute, Use of the U.S. Mail in Furtherance of a Drug Trafficking Offense and Conspiracy to Commit Money Laundering (Counts 2, 3, 8, 12 and 13 of the Superseding Indictment).

8. In connection with the pleas of guilty to Counts 2, 3, 6, 8, 12 and 13 of the Superseding Indictment, the defendants Mario Anthony Noble, Drew Wilson Crandall, Sean Michael Gygi, Katherine Lauren Anne Bustin and Alexandrya Marie Tonge agreed to forfeit to the United States all property, real or personal, that is derived from, used, or intended to be used in violation of 21 U.S.C. § 846, 21 U.S.C. § 952, 21 U.S.C. § 841(a)(1), 21 U.S.C. § 843(b) and 18 U.S.C. § 1956(h), including but not limited to:

**CURRENCY**

- \$1,227,773.00 in United States Currency
- \$19,520.00 in United States Currency
- \$429,600.00 in United States Currency
- \$5,357,950.38 in United States Currency, the proceeds of the sale of 513.15 Bitcoin
- \$671,030 in United States Currency
- \$134,960 in United States Currency
- 512.93 Bitcoin Cash (BCH)
- 513.15 Bitcoin Gold (BTG)
- 513.15 SegWit2x (B2X)
- 32.811 Bitcoin

**AUTOMOBILES**

- 2011 Ford F-350 pickup, VIN#1FT8W3BT7BEC88017
- 2008 BMW 135i, VIN#WBAUC73508VF25535

**MISCELLANEOUS**

- The pill press seized from the garage at Aaron SHAMO's residence on Titian Way.
- Associated pill dyes and stamps
- Four 100-ounce silver bars

9. Forfeiture of the above-identified property pursuant to 21 U.S.C. § 853 is appropriate based on the evidence presented in the Superseding Indictment filed on May 31, 2017, and the Statements in Advance of Plea filed on May 14, 2018, October 17, 2018 and June 7, 2018, respectively. The United States has established the requisite nexus between the property and the offenses.

10. In accordance with the provisions of Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States requests that it be permitted to undertake whatever discovery is necessary to identify, locate, or dispose of property subject to forfeiture.

WHEREFORE, the United States respectfully requests that this Court enter an Order of Forfeiture, forfeiting to the United States the property described herein and in the Superseding

Indictment, and order the United States Marshals Service to maintain custody of the forfeited property in accordance with the law.

Dated this 10<sup>th</sup> day of September, 2019.

JOHN W. HUBER  
United States Attorney

/s/ Cy H. Castle  
CY H. CASTLE  
Assistant U.S. Attorney